

FILED

2017 APR 26 AM 11:05

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

) S U P E R S E D I N G
) I N D I C T M E N T

Plaintiff,

) CASE NO. 1:16CR320

v.

) DISTRICT JUDGE

) DONALD C. NUGENT

JASAUN R. MATTICE,
BRITTANY McTIER,
CURTIS HINTON, and
REAUNA PASS.

)
) Title 18, United States Code,
) Sections 1344(1) and (2), 513(a),
) 1028A(a)(1), 1349 and 2

Defendants.

)

INTRODUCTION

The Grand Jury charges:

1. At all times material to this Superseding Indictment, Bank of America, Regions Bank, US Bank, Charter One Bank, United Texas Bank and First Merit Bank, Wells Fargo Bank, Huntington Bank, Citizens Bank and US Bank, were each financial institutions as defined in Title 18, United States Code, Section 20(1), the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC). Ohio Catholic Federal Credit Union was a financial institution as defined in Title 18, United States Code, Section 20(2), the accounts of which were insured by the National Credit Union Share Insurance Fund. CheckSmart and Eagle Express provided check cashing services at their locations within the Northern District of Ohio.

2. At all times material to this Superseding Indictment, defendant, JASAUN R. MATTICE, was the sole signator on two bank accounts opened at Bank of America (accounts

ending in 8616 and 8629). MATTICE opened these accounts in the name of Sovereign Vision Corporation DBA FUTURE VISION ENTERPRISES, and listed himself as the President/Secretary.

3. At all times material to this Superseding Indictment, Venture Data Limited (VDL) was a company headquartered in Salt Lake City, Utah and was engaged in the business of telephone surveys. VDL maintained an office in Kent, Ohio.

4. From approximately October 26, 2016, through December 19, 2016, JASAUN R. MATTICE was an inmate at the Cuyahoga County Jail (hereinafter "CCJ"), located in Cleveland, Ohio. As an inmate at the CCJ, MATTICE was assigned a personal identification number (hereinafter "PIN") for purposes of making outgoing telephone calls. MATTICE used his PIN, as well as the PIN of an individual named "Malcolm" to make outgoing telephone calls from the CCJ.

COUNTS 1- 12

(Bank Fraud, Title 18, United States Code, Sections 1344 (1) and (2) and 2)

The Grand Jury charges:

5. The allegations contained in paragraphs 1 through 4 inclusive, are incorporated by reference as if specifically re-written herein.

6. On or between October 14, 2014 and November 17, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, JASAUN R. MATTICE, knowingly executed and attempted to execute a scheme or artifice to defraud a financial institution; and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, to wit: Bank of America, Ohio Catholic Federal Credit

Union, Regions Bank, US Bank, Charter One Bank, United Texas Bank, and First Merit Bank, by means of false or fraudulent pretenses, representations, or promises.

7. As provided below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant executed and attempted to execute the scheme and artifice as set forth above, in that:

- a. Defendant obtained the check routing numbers of various business and individual bank accounts, without the permission of the account holders.
- b. Defendant created fraudulent and/or counterfeit checks utilizing the check routing numbers from various business and individual bank accounts, without the permission of the account holders.
- c. Defendant made these checks payable to Sovereign Vision Corp. and/or SVC and/or Jasaun Mattice.
- d. Defendant negotiated these fraudulently created and/or counterfeit checks through his Bank of America Sovereign Vision bank accounts, and stole the moneys obtained from negotiating the same.
- e. Defendant negotiated the following fraudulent/counterfeit checks as part of his scheme or artifice, each constituting a separate and distinct offense:

Count	Payor	Payee	Payor Bank	Approx. Date	Check No.	Amount	Deposit Into
1	St. Vincent DePaul Society	Sovereign Vision Corp	Ohio Catholic Federal Credit Union	10/14/14	4000	\$600.00	Bank of America 8629
2	R.B.	Sovereign Vision Corp	Regions Bank	10/20/14	3728	\$100.00	Bank of America 8629
3	St. Vincent DePaul Society	Sovereign Vision Corp.	Ohio Catholic Federal Credit Union	10/20/14	4010	\$2,250.81	Bank of America 8629

4	R. B.	Sovereign Vision	Regions Bank	10/24/14	3735	\$1,000.00	Bank of America 8616
5	Arbeit Inc.	Jasaun Mattice	US Bank	10/24/14	244320	\$526.48	Bank of America 8616
6	Always Towing	SVC	Charter One Bank	10/28/14	9020	\$1,473.52	Bank of America 8616
7	Always Towing	SVC	Charter One Bank	11/02/14	9030	\$3,000.00	Bank of America 8629
8	R. B.	Sovereign Vision	Regions Bank	11/06/14	3755	\$1,000.00	Bank of America 8616
9	R. B.	SVC	Regions Bank	11/09/14	3759	\$2,000.00	Bank of America 8616
10	Clifford Sheffield LLC	SVC	Charter One Bank	11/14/14	3000	\$5,000.00	Bank of America 8616
11	CSL Woodlands LLC	SVC	United Texas Bank	11/17/14	9000	\$3,985.00	Bank of America 8616
12	Clifford Sheffield LLC	SVC	Charter One Bank	11/17/14	3001	\$10,000.00	Bank of America 8616

All in violation of Title 18, United States Code, Sections 1344 (1) and (2) and 2.

COUNTS 13-24

(Possessing a Counterfeit Securities, Title 18, United States Code, Sections 513(a) and 2)

The Grand Jury further charges:

On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, defendant, JASAUN R. MATTICE, did knowingly make, utter, and possess a counterfeit security and forged security of an organization, each constituting a separate and distinct offense, to wit:

Count	Date	Check No.	Account Drawn On	Financial Institution	Amount
13	10/14/14	4000	St. Vincent DePaul Society	Ohio Catholic Federal Credit Union	\$600.00
14	10/20/14	3728	R.B.	Regions Bank	\$100.00
15	10/20/14	4010	St. Vincent DePaul Society	Ohio Catholic Federal Credit Union	\$2,250.81
16	10/24/14	3735	R.B.	Regions Bank	\$1,000.00
17	10/24/14	244320	Arbeit Inc.	US Bank	\$526.48
18	10/28/14	9020	Always Towing	Charter One Bank	\$1,473.52
19	11/02/14	9030	Always Towing	Charter One Bank	\$3,000.00
20	11/06/14	3755	R.B.	Regions Bank	\$1,000.00
21	11/09/14	3759	R.B.	Regions Bank	\$2,000.00
22	11/14/14	3000	Clifford Sheffield LLC	Charter One Bank	\$5,000.00
23	11/17/14	9000	CSL Woodlands LLC	United Texas Bank	\$3,985.00
24	11/17/14	3001	Clifford Sheffield LLC	Charter One Bank	\$10,000

All in violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT 25

(Aggravated Identity Theft, Title 18, United States Code, Sections 1028A(a)(1) and 2)

The Grand Jury further charges:

On or about October 20, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, JASAUN R. MATTICE, during and in relation to a felony violation of Title 18, United States Code, Sections 1344(1) and (2) (Bank Fraud, as charged in Count 2

herein), knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit: R.B., knowing that said means of identification belonged to another person, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 26

(Aggravated Identity Theft, Title 18, United States Code, Sections 1028A(a)(1) and 2)

The Grand Jury further charges:

On or about October 24, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, JASAUN R. MATTICE, during and in relation to a felony violation of Title 18, United States Code, Section 1344(1) and (2) (Bank Fraud, as charged in Count 4 herein), knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit: R.B., knowing that said means of identification belonged to another person, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 27

(Aggravated Identity Theft, Title 18, United States Code, Sections 1028A(a)(1) and 2)

The Grand Jury further charges:

On or about November 6, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, JASAUN R. MATTICE, during and in relation to a felony violation of Title 18, United States Code, Sections 1344(1) and (2) (Bank Fraud, as charged in Count 8 herein), knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit: R.B., knowing that said means of identification belonged to another person, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 28

(Aggravated Identity Theft, Title 18, United States Code, Sections 1028A(a)(1) and 2)

The Grand Jury further charges:

On or about November 9, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, JASAUN R. MATTICE, during and in relation to a felony violation of Title 18, United States Code, Sections 1344(1) and (2) (Bank Fraud, as charged in Count 9 herein), knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, to wit: R.B., knowing that said means of identification belonged to another person, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 29

(Conspiracy to Commit Bank Fraud, Title 18, United States Code, Section 1349)

8. The allegations contained in paragraphs 1 through 4 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

9. Beginning in or around September 10, 2016, and continuing to in or around January 24, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JASAUN R. MATTICE, BRITTANY McTIER, CURTIS HINTON, and REAUNA PASS, along with other persons whose identities are known and unknown to the Grand Jury, did knowingly and voluntarily combine, conspire, confederate and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to knowingly execute and attempt to execute a scheme to defraud a federally insured financial institution, and to obtain money and property owned by and under the custody and control of a federally insured financial institution,

by means of false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Sections 1344 (1) and (2).

OBJECTS OF THE CONSPIRACY

10. The object of the conspiracy was to defraud financial institutions by creating fraudulent and/or counterfeit checks, to negotiate these fraudulent and/or counterfeit checks, and to obtain the moneys therefrom in order to enrich the co-conspirators.

MANNER AND MEANS

11. Defendants and their co-conspirators employed the following manner and means to attain the objectives of the conspiracy.

a. It was a part of the conspiracy that from in or around September 10, 2016, through in or around January 24, 2017, JASAUN R. MATTICE, BRITTANY McTIER, REAUNA PASS, CURTIS HINTON, and others, known and unknown to the Grand Jury participated in a scheme to use the check routing number from VDL to manufacture fraudulent and/or counterfeit checks for the purpose of cashing the same with financial institutions, including Wells Fargo Bank, Huntington Bank, Citizens Bank, and US Bank, and obtaining the moneys therefrom.

b. REAUNA PASS applied for a job with VDL and was trained on or about September 10, 2016, at the Kent, Ohio location. PASS was given a paycheck for her training. PASS, however, never showed up for work. PASS obtained the check routing number of VDL by training with VDL for a job and being paid via check from VDL for that training.

c. While incarcerated at the CCJ, JASAUN MATTICE used the telephone at the CCJ to direct others, including BRITTANY McTIER, REAUNA PASS, and CURTIS

HINTON, to manufacture fraudulent checks and to direct others to cash and attempt to cash the same.

d. JASAUN R. MATTICE directed BRITTANY McTIER, and others, to create fraudulent and/or counterfeit checks utilizing the check routing number from VDL, without the permission of VDL.

e. JASAUN R. MATTICE directed BRITTANY McTIER, to make these fraudulent VDL checks payable to others, including REAUNA PASS, CURTIS HINTON, B.A. 1 (named but not indicted herein), Z.H. (identified but not indicted herein), J.F. (identified but not indicted herein), and B.A. 2. (identified but not indicted herein).

f. CURTIS HINTON directed B.A. 1 to provide B.A.1's name and a photograph of his identification card to an individual for purpose of the manufacture of fraudulent and/or counterfeit checks. B.A. 1 provided his name and a photograph of his identification card to an individual via Instagram, as directed by CURTIS HINTON.

g. CURTIS HINTON provided B.A. 1 several fraudulent/counterfeit VDL checks for B.A. 1 to negotiate.

ACTS IN FURTHERANCE OF THE CONSPIRACY

12. Defendants and their co-conspirators committed one or more of the following acts in furtherance of the conspiracy in the Northern District of Ohio, and elsewhere:

a. On or about October 27, 2016, Z.H. attempted to cash fraudulent and/or counterfeit VDL check #42042 in the amount of \$428.45 at Eagle Express, purportedly drawn on the account of VDL at Wells Fargo Bank.

b. On or about October 27, 2016, B.A. 1 cashed fraudulent and/or counterfeit VDL check # 42050 in the amount of \$2,635.54 at Huntington Bank, purportedly drawn on the account of VDL at Wells Fargo Bank.

c. On or about October 27, 2016, B.A. 1 cashed fraudulent and/or counterfeit VDL check #42085 in the amount of \$1,939.50 at Huntington Bank, purportedly drawn on the account of VDL at Wells Fargo Bank.

d. On or about October 27, 2016, B.A. 1 cashed fraudulent and/or counterfeit VDL check #42084 in the amount of \$3,306.45 at Huntington Bank, purportedly drawn on the account of VDL at Wells Fargo Bank.

e. On or about October 28, 2016, Z.H. cashed fraudulent and/or counterfeit check #42043 in the amount of \$523.89 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

f. On or about October 28, 2016, CURTIS HINTON cashed fraudulent and/or counterfeit check #42047 in the amount of \$636.00 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

g. On or about October 28, 2016, REAUNA PASS cashed fraudulent and/or counterfeit VDL check #42075 in the amount of \$433.26 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

h. On or about October 29, 2016, J. F. cashed fraudulent and/or counterfeit check #42054 in the amount of \$429.17 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

i. On or about October 29, 2016, CURTIS HINTON attempted to cash a fraudulent and/or counterfeit check #42076 in the amount of \$922.68 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

j. On October 29, 2016, at approximately 5:15 p.m., JASAUN R. MATTICE, while incarcerated at the CCJ, had a conversation with CURTIS HINTON on the telephone. HINTON told MATTICE, "She needs to give me the white boy stuff (fraudulent checks for B.A. 1). We talked about the white boy stuff. That's it. She don't need... she gave me uh 8 dollars (checks totaling an amount of money) for the white boy. I'm like that ain't even enough (unintelligible). Eight dollars? I'm like wait a minute." MATTICE responded, "... need to take it up to like nine dollars and ninety-nine cent, right?" HINTON responded, "No! No, no, no! These people like sixty and seventy years old (unwitting individuals whose bank account was used to cash fraudulent checks) ...they had the same (bank account) for so many years...they've never had no problems with this (with their bank account). They have never had nothing..." MATTICE responded, "Ohhhhhh!!!! I see (understand) what you sayin'. You wanna go in (go with a higher amount)?" HINTON responded, "The dude, white boy, that I'm f----n' with, he doin' it (cashing fraudulent checks) because he has the same last name as them." MATTICE asked, "The same last name as who?" HINTON responded, "As his parents." HINTON continued, "It's his parents' stuff. It's not his, so. But he put one in his name that has nothing to do with J & M Industries, you know what I'm sayin'?" Later in the conversation, MATTICE told HINTON, "This is what I'm gonna tell her to do man, I got some easy s--t (fraudulent checks that will pass easily). You know what I'm sayin'? It came out all the way proper, you know what I'm sayin'? Ain't gotta do nothin' but hit the button on that s--t, give it a name (place a payee name on the check) and hit the button. You know what I'm sayin'? But

uh...I make sure that s--t go into full effect. You know what I'm sayin'? Just make sure uh...just tell her to uh give you the VDL. VDL. Just remember that name. VDL." HINTON replied, "VDL?" MATTICE responded, "VDL." HINTON replied, "VDL?" MATTICE responded, "VDL." HINTON then three-wayed BRITTANY McTIER into the call.

k. On or about October 31, 2016, B.A. 1 attempted to cash counterfeit and/or fraudulent check #42091 in the amount of \$1,235.56 at CheckSmart, purportedly drawn on the account of VDL at Wells Fargo Bank.

l. On November 1, 2016, at approximately 8:31 p.m., JASAUN R. MATTICE, while incarcerated at the CCJ, had a conversation with CURTIS HINTON on the telephone. MATTICE told HINTON, "Everything I gave you is good (all of the fraudulent checks should clear)." HINTON responded, "Listen to me boss, the white boy (B.A. 1) already done uh....blew down on me about it....sayin' that they (the checks) was fraud or some s--t. That's what the bank told him." MATTICE responded, "Tell that m----f----r to produce some paperwork. If the bank told him that, there's a statement to say that. There's a receipt. Tell that n----r to send pictures or somethin'...because at this point there ain't no time for no one to be lying and playing no games, boy. This s--t is first time right here, bro (this set of fraudulent checks have never been used before)." Later in the conversation, MATTICE told HINTON, "That s--t ain't never been touched (that account and those fraudulent checks have never been used before)," and told him, "I been doing this for too long, bro.... This don't happen that fast, bro (banks don't discover checks are fraudulent this quickly)." MATTICE asked HINTON, "You ain't go with that m----f----r from point A, B to C (did you go to the bank with B.A. 1)?" HINTON responded, "Yeah! Everybody was there for real. They sat there and watched him." MATTICE responded, "I ain't even talked with the girls (BRITTANY McTIER and REAUNA

PASS) yet." HINTON responded, "They (the girls) was there. They was in the parking lot." HINTON then told MATTICE, "They (the girls) gave me some more (checks), I took them (the checks) to somewhere else, and they said the same thing. They said the 'f' (fraud) word." MATTICE asked HINTON, "What did you all drop in there (what check did you try to cash)? Give me the name on it." HINTON responded, "Bryan Arnold and ..." MATTICE corrected him by saying, "No, no, no, no, no, the name in the top left corner." HINTON replied, "Some Salt Lake City s--t." MATTICE responded, "That's perfect! That s--t should have never came back fraud. Hell, fuckin' naw. Let me call that man."

m. On November 1, 2016, at approximately 8:36 p.m., JASAUN MATTICE, while incarcerated at the CCJ, had a conversation with BRITTANY McTIER on the telephone. MATTICE told McTIER, "I just called that m----f---r. Man, that n----r lyin'." McTIER asked, "What he say?" MATTICE responded, "He talkin' 'bout everything came back with an 'f' (fraud) on it. Ain't no s--t come back with an 'f' on it when I find out what the f--k he using (which fraudulent checks were being used). He tell me Salt Lake City. Yeah, Salt Lake City, that s--t been (unintelligible)...that s--t ain't been touched (these fraudulent checks have not been used before)..." REAUNA PASS then joined the telephone call. MATTICE instructed PASS to call another male. PASS did so. MATTICE told the male, "I need a favor man. I got \$8,000... I need him to go get Juvi and go over there and get this \$8,000 this n----r just ran off with. Send Juvi over there to go get that money." MATTICE later provided an address to PASS and the male on the telephone to go get the male that had stolen MATTICE's \$8,000. MATTICE also relayed to PASS the conversation he had with "Curt (HINTON)" regarding the fraudulent VDL checks. PASS told MATTICE that HINTON told PASS "f--- y--" regarding the VDL checks. MATTICE then instructed PASS to tell "Ju (Juvi)" to "take one of the shooters

(guns) up there and blaze his (HINTON's) ass (shoot him), but first bruise (beat) him, then blaze him." PASS then relayed the message to "Ju (Juvi)" while still on the telephone with MATTICE. MATTICE then had HINTON three-wayed into the call and told HINTON he better "m----r f----n' hide."

n. On November 1, 2016, at approximately 8:59 p.m., JASAUN MATTICE, while incarcerated at the CCJ, had a conversation with CURTIS HINTON on the telephone. During the conversation, MATTICE berated HINTON regarding the VDL checks, claiming that the fraudulent checks were "golden," and "that is why I gave them to you." MATTICE told HINTON, "You f----n' with me and you my right hand n----r. You ain't doin' what you supposed to be doin', bro! You know it!" MATTICE told HINTON that "everybody got to play their f----n' position (everyone has to do their assigned task/job)." MATTICE continued, "How the f--k am I the mastermind runnin' s--t from inside (of the jail) and I can't even get the people I f--k with and depend on to come together as one, as one f----n' unit?" MATTICE told HINTON that he needed to have "superior control" and that "this (manufacturing and cashing fraudulent checks) is business. Business first."

All in violation of Title 18, United States Code, Section 1349.

COUNTS 30-39

(Bank Fraud, Title 18, United States Code, Sections 1344 (1) and (2) and 2))

The Grand Jury further charges:

15. The allegations contained in paragraphs 1 through 4, inclusive, are incorporated by reference as if specifically re-written herein.
16. On or between approximately September 10, 2016 and January 24, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, JASAUN R. MATTICE,

BRITTANY McTIER, CURTIS HINTON, REAUNA PASS, and others, known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme or artifice to defraud a federally insured financial institution; and to obtain money and property owned by and under the custody and control of a federally insured financial institution by means of false and fraudulent pretenses, representations, or promises.

17. As provided below, in the Northern District of Ohio, Eastern Division, and elsewhere, JASAUN R. MATTICE, BRITTANY McTIER, CURTIS HINTON, REAUNA PASS, and others known and unknown to the Grand Jury, executed and attempted to execute a scheme and artifice to defraud financial institutions and to obtain money and property as set forth above, in that:

- a. REAUNA PASS obtained the check routing number of VDL by training with VDL for a job and being paid via check from VDL for that training.
- b. JASAUN R. MATTICE directed BRITTANY McTIER, and others, to create fraudulent and/or counterfeit checks utilizing the check routing number from VDL, without the permission of VDL.
- c. JASAUN R. MATTICE directed BRITTANY McTIER, to make these fraudulent and/or counterfeit VDL checks payable to others, including REAUNA PASS, CURTIS HINTON, B.A. 1 (identified but not indicted herein), Z.H. (identified but not indicted herein), J.F. (identified but not indicted herein), and B.A. 2 (identified but not indicted herein).
- d. JASAUN R. MATTICE directed BRITTANY McTIER and CURTIS HINTON, to provide others, including REAUNA PASS, B.A. 1, Z.H. and J.F., fraudulent and/or counterfeit VDL checks for these individuals to negotiate and obtain moneys as part of this

scheme and artifice, each fraudulent/counterfeit VDL check constituting a separate and distinct offense:

Count	Payor & Payee	DEFENDANT(S)	Payor Bank	Approx. Date	Check No.	Amount	Cashed at/Att. Cashing
30	Venture Data, LLC (B.A. 2)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/27/16	42050	\$2, 635.54	Huntington Bank
31	Venture Data, LLC (B.A.1)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/27/16	42085	\$1,939.53	Huntington Bank
32	Venture Data, LLC (B.A. 2)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/27/16	42084	\$3, 306.45	Huntington Bank
33	Venture Data, LLC (Z.H.)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/27/16	42042	\$428.45	Eagle Express/ Citizens Bank (Attempt)
34	Venture Data, LLC (Z.H.)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/28/16	42043	\$523.89	CheckSmart/ US Bank
35	Venture Data, LLC CURTIS HINTON	CURTIS HINTON JASAUN R. MATTICE	Wells Fargo Bank, NA	10/28/16	42047	\$636.00	CheckSmart/ US Bank
36	Venture Data, LLC REAUNA PASS	REAUNA PASS JASAUN R. MATTICE	Wells Fargo Bank, NA	10/28/16	42075	\$433.26	CheckSmart/ US Bank
37	Venture Data, LLC (J.F.)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/29/16	42054	\$429.17	CheckSmart/ US Bank

38	Venture Data, LLC	JASAUN R. MATTICE CURTIS HINTON	Wells Fargo Bank, NA	10/29/16	42076	\$922.68	CheckSmart/ US Bank (Attempt)
39	Venture Data, LLC (B.A. 1)	JASAUN R. MATTICE	Wells Fargo Bank, NA	10/31/16	42091	\$1, 235.56	CheckSmart/ US Bank (Attempt)

All in violation of Title 18, United States Code, Sections 1344 (1) and (2) and 2.

COUNTS 40-44

(Possessing Counterfeit Securities, Title 18, United States Code, Sections 513(a) and 2)

The Grand Jury further charges:

On or about the dates set forth below, in the Northern District of Ohio, Eastern Division, defendants, JASAUN R. MATTICE, BRITTANY McTIER, REAUNA PASS, CURTIS HINTON, and B.A. 1 (named but not indicted herein) did knowingly make, utter, and possess a counterfeit security and forged security of an organization, and/or aid or abet the same, each constituting a separate and distinct offense, to wit:

Count	Payor & Payee	DEFENDANT(S)	Approx. Date	Check No.	Financial Institution	Amount
40	Venture Data, LLC REAUNA PASS	REAUNA PASS JASAUN R. MATTICE	10/28/16	42075	Check Smart/US Bank	\$433.26
41	Venture Data, LLC (B.A.2)	JASAUN R. MATTICE	10/27/16	42050	Huntington Bank	\$2,635.54
42	Venture Data, LLC (B.A.1)	JASAUN R. MATTICE	10/27/16	42085	Huntington Bank	\$1, 939.53

43	Venture Data, LLC (B.A.2)	JASAUN R. MATTICE	10/27/16	42084	Huntington Bank	\$3,306.45
44	Venture Data, LLC CURTIS HINTON	CURTIS HINTON JASAUN R. MATTICE	10/28/16	42047	Check Smart/US Bank	\$636.00

All in violation of Title 18, United States Code, Sections 513(a) and 2.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002